

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

<b>BAILIE BYE,</b>	)	<b>CIVIL ACTION NO.</b>
	)	
<b>Plaintiff,</b>	)	<b>1:20-cv-3-HSO-JCG</b>
	)	
<b>v.</b>	)	<b>JUDGE:</b>
	)	<b>HALIL SUL OZERDEN</b>
	)	
<b>MGM RESORTS INTERNATIONAL, INC. d/b/a BEAU RIVAGE RESORT AND CASINO,</b>	)	<b>MAGISTRATE:</b>
	)	<b>JOHN C. GARGIULO</b>
	)	
<b>Defendant.</b>	)	<b><u>UNOPPOSED</u></b>

**DEFENDANT’S MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSIVE PLEADING**

**NOW COMES** defendant, MGM Resorts International, Inc.<sup>1</sup>, (“Defendant” or “MGM”), through undersigned counsel, and respectfully moves this Court for an extension of the deadline to respond to plaintiff’s Complaint.

1. On November 13, 2019, plaintiff, Bailie Bye, filed a Complaint against MGM in Circuit Court of Harrison County, Second Judicial District, Mississippi;

2. MGM was served with a copy of the State Court Complaint through its agent for service of process on December 6, 2019.

3. MGM removed the matter to this Court on January 6, 2020;

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<sup>1</sup> Beau Rivage Resorts, LLC is the proper defendant in this matter and the entity that employed Plaintiff.

4. Undersigned counsel requires additional time to investigate and respond to plaintiff's allegations.

5. Undersigned counsel contacted Plaintiff's counsel regarding the requested extension and Plaintiff's counsel consents to this motion.

6. This request is not made for purposes of delay.

Accordingly, defendant respectfully requests that the Court issue an Order extending the time for the filing of its responsive pleading for fourteen (14) days until and including January 27, 2020.

Respectfully submitted this the 10<sup>th</sup> day of January, 2020.

/s/ Tammy L. Baker

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**Attorney for Defendant**

**MGM Resorts International, Inc.**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 10, 2020, I have served a true and correct copy of the foregoing via the Court's CM/ECF filing system upon the following counsel of record:

Daniel M. Waide  
1300 Hardy Street  
P.O. Box 17738  
Hattiesburg, MS 39404

/s/ Tammy L. Baker  
Counsel for Defendant